

ELLEN F. ROSENBLUM
Attorney General
JAMES S. SMITH #84093
Senior Assistant Attorney General
DIRK L. PIERSON #94128
Senior Assistant Attorney General
Trial Attorneys
Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
Telephone: (503) 947-4700
Fax: (503) 947-4791
Email: James.S.Smith@doj.state.or.us
Dirk.L.Pierson@doj.state.or.us

Attorneys for Defendants Oregon Department of Human Services (DHS), Diane Bradley, Tanya Burroughs (fka Gilbert), and Judi Martin

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

A.G.; B.J.; D.S.; E.K.; EP.-D.; J.B.;
K.R.; M.F.; S.B.; and JANE AND JOHN
DOES 1-50,

Plaintiffs,

v.

THE OREGON DEPARTMENT OF HUMAN
SERVICES ("DHS"), a government agency;
JANE DOE CERTIFIER, in her individual
capacity, an individual; JANE OR JOHN DOE
CERTIFIER-SUPERVISOR 1, in his or her
individual capacity, an individual; JUDI
MARTIN, in her individual capacity, an
individual; JANE OR JOHN DOE
CERTIFIER-SUPERVISOR 2, in her or his
individual capacity; JANE DOE ADOPTION
CASEWORKER, in her individual capacity,
an individual; JANE OR JOHN DOE
ADOPTION CASEWORKER-
SUPERVISOR, in his or her individual

Case No. 3:13-cv-01051-AC

DEFENDANTS DHS, BRADLEY,
BURROUGHS, AND MARTIN'S RESPONSE
TO PLAINTIFFS' MOTION TO FILE A
REPLY CONCERNING MOTION TO
COMPEL

capacity, an individual; JAMES EARL MOONEY, in his individual capacity, an individual; JANE OR JOHN DOE CASEWORKERS A 1-9, in their individual capacities; JANE OR JOHN DOE CASEWORKER-SUPERVISORS B 1-9, in their individual capacities; JANE OR JOHN DOE CASEWORKERS C 1-50, in their individual capacities; JANE OR JOHN DOE CASEWORKER-SUPERVISORS D 1-50, in their individual capacities; TANYA BURROUGHS, in her individual capacity, an individual; DIANE BRADLEY, in her individual capacity, an individual; JANE OR JOHN DOE DEFENDANTS 1-25, in their individual capacity,

Defendants.

This Court's Local Rules limit the briefing on discovery motions, prohibiting a Reply brief. Plaintiffs seek permission for a Reply brief concerning the Plaintiffs' Motion to Compel, but have offered nothing that distinguishes this case or these facts from any of the other civil cases to which the Local Rules apply. Moreover, the parties in this case have agreed that the Court should consider all discovery issues pending at oral argument on January 15, 2014.

DATED December 30, 2013.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ James S. Smith
JAMES S. SMITH #84093
DIRK L. PIERSON #94128
Senior Assistant Attorney General
Trial Attorneys
Tel (503) 947-4700
Fax (503) 947-4791
James.S.Smith@doj.state.or.us
Dirk.L.Pierson@doj.state.or.us
Of Attorneys for Defendants Oregon
Department of Human Services (DHS),
Diane Bradley, Tanya Burroughs (nka
Gilbert), and Judi Martin